

1 **JENNY L. FOLEY, Ph.D., ESQ.**

Nevada Bar No. 9017

2 **HKM EMPLOYMENT ATTORNEYS LLP**

1785 E. Sahara Ave, Suite 325

3 Las Vegas, NV 89104

4 Tel: (702) 625-3893

Fax: (702) 625-3893

5 E-mail: jfoley@hkm.com

Attorney for Plaintiff

6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8 MELINDA GREEN, An Individual) CASE NO. **2:18-cv-00119**

9)
10 Plaintiff,)

11 vs.)

12 TRULITE GLASS AND ALUMINUM)
13 SOLUTIONS, LLC, a Foreign Corporation,)
DOES I -X; ROE CORPORATIONS I -X.)

14 Defendants.)
15)

16 **STIPULATION AND ORDER TO EXTEND THE TIME FOR PLAINTIFF TO**
17 **RESPOND TO DEFENDANT'S MOTION FOR PARTIAL DISMISSAL AND FOR**
18 **DEFENDANT TO FILE ITS REPLY IN SUPPORT OF THAT MOTION FOR**
19 **PARTIAL DISMISSAL**
20 **(SECOND REQUEST)**

21 COMES NOW, the Plaintiff, MELINDA GREEN ("Melinda"), by and through her
22 attorney, JENNY L. FOLEY, Ph.D., ESQ., of the law firm HKM EMPLOYMENT
23 ATTORNEYS LLP, and Defendant, TRULITE GLASS AND ALUMINUM SOLUTIONS,
24 LLC, ("Trulite"), by and through its attorney, TIMOTHY ROEHRS, ESQ., of LITTLER
25 MENDELSON, P.C. and hereby stipulate and agree as follows:

26 1. That the Opposition to the Defendant's Motion for Partial Dismissal that is due
27 on April 9th, 2018, will now be due on April 23rd, 2018.

1 2. That the Reply to the Opposition to the Defendant's Motion for Partial Dismissal
2 will then be due on May 7th, 2018.

3 3. That the Defendant's original Motion for Partial Dismissal was filed on March
4 19, 2018 with a response due from Plaintiff on April 2, 2018.

5 4. This request for an extension of time is made in good faith and not for purpose
6 of delay. The request is being made because the parties are presently working on a stipulation
7 that they believe will result in the withdrawal of Defendant's Motion for Partial Dismissal and
8 the filing of an Amended Complaint. This is the second request for an extension of time with
9 respect to the Opposition and Reply briefs associated with Defendant's Motion for Partial
10 Dismissal.
11

12
13
14 Dated this 10th day of April, 2018.

Dated this 10th day of April, 2018.

15 **HKM Employment Attorneys LLP**

Littler Mendelson P.C.

16
17 /s/ Jenny L. Foley
18 Jenny L. Foley, Ph.D., Esq.
19 Nevada Bar No. 9017
1785 East Sahara Ave., Suite 325
20 Las Vegas, Nevada 89104

/s/ Timothy W. Roehrs
Timothy Roehrs, Esq.
Nevada Bar No. 9668
3960 Howard Hughes Parkway,
Suite 300
Las Vegas, Nevada 89169

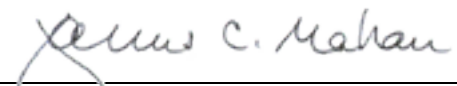
1
2
3 **ORDER**
4

5 The Court having reviewed the foregoing STIPULATION TO EXTEND THE TIME
6 FOR PLAINTIFF TO RESPOND TO DEFENDANT'S MOTION FOR PARTIAL
7 DISMISSAL AND FOR DEFENDANT TO FILE ITS REPLY IN SUPPORT OF THAT
8 MOTION FOR PARTIAL DISMISSAL in the above-entitled matter and for good cause
9 appearing therefor,

10 **IT IS SO ORDERED** that the Opposition to the Defendant's Motion for Partial
11 Dismissal shall be due on April 23rd, 2018;
12

13 **IT IS SO ORDERED that** the Reply to the Opposition to the Defendant's Motion for
14 Partial Dismissal shall be due on May 7th, 2018.
15
16
17
18

19 Dated: April 17, 2018

20
21 
22 UNITED STATES DISTRICT JUDGE

23 Respectfully submitted by:
24 **HKM Employment Attorneys LLP**
25

26 /s/ Jenny L. Foley
27 Jenny L. Foley, Ph.D., Esq.
28 Nevada Bar No. 9017
1785 East Sahara Ave, Suite 325

1 Las Vegas, Nevada 89104
2 *Attorney for Plaintiff*

3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28